

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, all parties jointly move the court to dismiss with prejudice, parties to bear their own costs, and terminate from the docket of the court the actions listed on the attached Exhibit A.

Respectfully submitted,

/s/John C. Thornton, III
John C. Thornton, III
Andrews & Thornton
2 Corporate Park, Ste. 110
Irvine, CA 92606
949.748.1000
jct@andrewsthornton.com
Counsel for Plaintiffs

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com

Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

<i>Case Number</i>	<i>Case Style</i>
2:13-cv-17924	Dahlberg et al v. Ethicon, Inc. et al
2:13-cv-17925	Metzger v. Ethicon, Inc. et al
2:13-cv-17928	Viscounte et al v. Ethicon, Inc. et al
2:13-cv-17929	Jeffries et al v. Ethicon, Inc. et al
2:13-cv-17934	Fisher v. Ethicon, Inc. et al
2:13-cv-18093	Scott et al v. Ethicon, Inc., et al
2:13-cv-18295	Kaulukukui v. Ethicon, Inc. et al